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6 Attorneys for Plaintiff  
7 WEBCOR CONSTRUCTION, INC. dba WEBCOR BUILDERS

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

10 UNITED STATES of AMERICA for the Use and  
11 Benefit of WEBCOR CONSTRUCTION, INC.  
dba WEBCOR BUILDERS, and WEBCOR  
12 CONSTRUCTION, INC. dba WEBCOR  
13 BUILDERS,

14 Plaintiffs,

15 v.

16 DICK/MORGANTI, a joint venture, DICK  
17 CORPORATION, THE MORGANTI GROUP,  
AMERICAN CASUALTY COMPANY OF  
18 READING, PA, NATIONAL UNION FIRE  
19 INSURANCE COMPANY OF PITTSBURGH,  
PA, and DOES 1 through 10, inclusive,

20 Defendants.  
21

Case No. C07-2564 CRB

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND RESPONSE  
DEADLINE**

22  
23 The parties hereto stipulate that good cause exists to extend the time for all defendants to  
24 respond to Webcor's Complaint herein to and including September 17, 2007. The parties herein are  
25 currently involved in good faith efforts to resolve this complex construction dispute involving the  
26 newly constructed GSA Federal Building in San Francisco. By allowing the defendants herein to have  
27 until September 17, 2007 to respond to Webcor's Complaint, significant judicial resources will be  
28 00236696

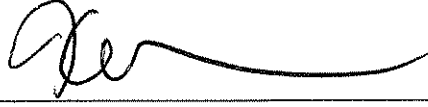
-1-

**STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINES**


1 conserved in that defendants may have received a response back from the Owner regarding the items  
2 contained in the Complaint.

3 There have been no previous time modifications in this case and the current Case Management  
4 Conference is scheduled for August 24, 2007. The parties herein request that this Case Management  
5 Conference be rescheduled in November 2007.

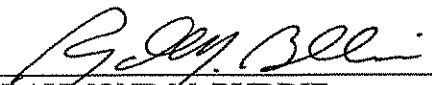
6 DATED: June 28, 2007 BOWLES & VERNA LLP

7  
8 By   
9 KENNETH G. JONES  
10 Attorneys for Plaintiff Webcor  
Construction, Inc. dba Webcor Builders

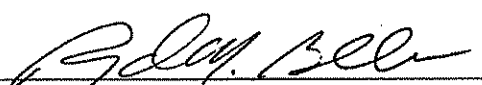
11 DATED: June 27, 2007 PECKAR & ABRAMSON, P.C.

12  
13 By   
14 RAYMOND M. BUDDIE  
15 Attorneys for Defendant Dick Morganti,  
Dick Corporation, The Morganti Group

16 DATED: June 27, 2007 PECKAR & ABRAMSON, P.C.

17  
18 By   
19 RAYMOND M. BUDDIE  
20 Attorneys for Defendant American Casualty  
Company of Reading, Pennsylvania

21 DATED: June 27, 2007 PECKAR & ABRAMSON, P.C.

22  
23 By   
24 RAYMOND M. BUDDIE  
25 Attorneys for Defendant National Union  
26 Fire Insurance Company of Pittsburgh,  
27 Pennsylvania

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-2-

**[PROPOSED] ORDER**

The Court has considered the Stipulation submitted by the parties, and good cause appearing, it is hereby Ordered that the deadline for all defendants to respond to Webcor's Complaint herein shall be extended to and include September 17, 2007.

It is further ordered that the Case Management Conference scheduled for August 24, 2007 be continued to \_\_\_\_\_, 2007.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2007

\_\_\_\_\_  
United States District Court Judge  
Northern District Court of California

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-3-

**STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINES**

**PROOF OF SERVICE**

**USDC Northern District of California, Case No. C07-2564 CRB**

I, the undersigned, declare as follows: I am a citizen of the United States, over the age of 18 years, and not a party to, or interested in the within entitled action. I am an employee of BOWLES & VERNA LLP, and my business address is 2121 N. California Blvd., Suite 875, Walnut Creek, California 94596.

On June 28, 2007, I served the following document(s):

**STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE**

on the following parties in this action addressed as follows:

Raymond M. Buddie  
PECKAR & ABRAMSON, P.C.  
250 Montgomery Street  
16th Floor  
San Francisco, CA 94104  
tel. +1 415.837.1968  
fax +1 415.837.1320

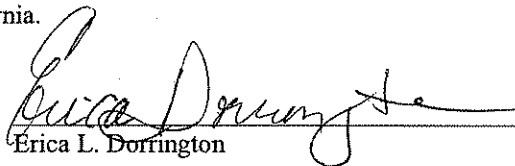
**XXX BY MAIL:** I caused each such envelope, with postage thereon fully paid, to be placed in the United States mail at Walnut Creek, California. I am readily familiar with the business practice for collection and processing of mail in this office. That in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service in Walnut Creek on that same day. I understand that service shall be presumed invalid upon motion of a party served if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained on this affidavit.

**BY PERSONAL SERVICE:** I delivered each such envelope by hand to each party addressee above.

**BY OVERNIGHT DELIVERY:** I caused each envelope, with delivery fees provided for, to be deposited in a box regularly maintained by UPS/Federal Express. I am readily familiar with Bowles & Verna's practice for collection and processing of correspondence for overnight delivery and know that in the ordinary course of Bowles & Verna's business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS/Federal Express or delivered to an authorized courier or driver authorized by UPS/Federal Express to receive documents on the same date that it is placed at Bowles & Verna for collection.

**BY FACSIMILE:** By use of facsimile machine number (925) 935-0371, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  
Executed on June 28, 2007, at Walnut Creek, California.

  
Erica L. Dorrington